

May 14, 2003

Filed Electronically to Docket

EPA Docket Center (Air Docket)
U.S. EPA (MD-6102T)
Room B-108
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Attention Docket ID Number OAR-2002-0053

Re: Associated Electric Cooperative, Inc.'s Comments on New Source Performance Standards for Stationary Gas Turbines Pursuant to 40 CFR Part 60, Subpart GG, Direct Final Rule, 68 Fed. Reg. 17,990 (April 14, 2003).

Dear Sir or Madam:

Associated Electric Cooperative, Inc. ("Associated")¹ submits the following comments on the Environmental Protection Agency's ("EPA") direct final rule in which it amends the new source performance standards for stationary gas combustion turbines pursuant to 40 Code of Federal Regulations (CFR) Part 60, Subpart GG. 68 Fed. Reg. 17,990 (April 14, 2003).

1. EPA should remove the ISO correction calculation.

Associated recommends the removal of the ISO correction calculation. This calculation is convoluted and not practical for the modern turbine. Further, incorporation of the ISO correction factor within a continuous emissions monitoring system (CEMS) requires

¹ Associated Electric Cooperative, Inc., is owned by and supplies wholesale power to six (6) regional generation and transmission cooperatives that provides rural electric power to its member-owners. These electric utility systems supply wholesale power to 51 distribution cooperatives in Missouri, southern Iowa and northeast Oklahoma serving more than 750,000 retail consumers. These distribution cooperatives provide electric service directly to consumer members, including businesses, farms, and households. Associated is headquartered in Springfield, MO, which owns and operates two major coal-fired power plants located in north-central and southeast Missouri. Since 1998, Associated has added over 1600 MW of gas generation in the form of both combined-cycle and peaking simple-cycle combustion turbine units.

burdensome administrative changes and unnecessary certification. Making the calculation correction transparent within the CEMS becomes too problematic for the permitted installation.

2. Support for optional ISO correction calculation for specific units (Subpart H).

Associated supports language making the correction to ISO calculation optional for specific gas turbines. Associated believes EPA needs to provide greater clarification and definition of what constitutes a lean premix combustor.

For example, turbines that burn dual fuels and operate using two different modes when burning natural gas versus fuel oil do not fit into a clear definition of a specific unit type. The unit may be permitted to burn a limited amount of hours on fuel oil. However, this back up fuel source operation should be considered for inclusion in the definition for lean premix burning units, based on permitted operational restriction and other limitations.

Associated recommends the use of definition for a “gas-fired unit” found in 40 CFR Part 72 for Part 75 purposes to accommodate a unit that predominantly fires in the lean premix mode of operation, but has limited operating hours for firing fuel oil (diffusion flame operation).

Associated supports the optional use of the ISO correction calculation detailed under Subpart H of the direct final rule as an alternative to removal of the provision.

3. Remove averaging period changes to standard.

Associated strongly opposes the 4-hour average period to determine compliance with Subpart GG. Currently, Associated holds several recently permitted facilities with stated rolling averaging periods of 3-hr, 30-days, and 12-month. Associated believes EPA should base averaging times on the stated permit conditions of a PSD/NSR permit issued by the permitting authority. Subpart GG should remain silent on this issue other than the time it takes to conduct the required compliance stack testing.

4. Remove ambient condition record keeping requirements.

Associated proposes EPA should remove the requirement to record ambient conditions when operating the CT. This requirement is burdensome and unnecessary. It adds an administrative requirement that has no bearing on the environment.

5. Fuel oil sampling options and clarification of compliance requirements.

Associated believes EPA should provide additional options to sampling for nitrogen and sulfur content in fuel oil burned in the combustion turbine(s). EPA should clarify the requirement to conduct daily sampling only “while the unit is operating.” Taking samples for the sake of taking samples is unnecessary.

Further, installations with multiple units located at a facility but operated from the same fuel oil forwarding skid, tank, or fuel oil lines should be allowed to take one sample for the day for all units operated during an official "unit operating day." Sampling and analyses of fuel oil samples taken from units that operate less than 500 hours in any 12-month rolling average period is costly. In light of permit conditions that require premium low sulfur fuels, the amount of SO₂ emitted from these peaking gas turbines is negligible to immeasurable.

6. Remove parameter monitoring plan requirements proposed pursuant to 60.334(g).

Associated opposes and requests the removal of the parameter monitoring plan requirement proposed in 60.334(g). This does not streamline the differences between Subpart GG and 40 CFR Part 75, Appendix E requirements. Appendix E adequately addressed this issue.

The goal of EPA should not be to increase recertification testing through this rule making, where Part 75, Appendix E rules have been recently changed to allow 20 calendar months between required testing, at a minimum.

7. Remove conflicting or inconsistencies in compliance standards for sulfur.

Associated opposes the conflicting sulfur compliance standards in fuel used between Part 75 and Part 60. Part 75 allows a 0.5 grains per 100 scf sulfur content, where Part 60 is now proposing a range between 0.4 - 0.8% sulfur. This mismatch between units of compliance should be reconciled. These differing standards and units of measure have been a major reason the direct final rule has been changed. This would be the appropriate time to have this rule become more in sync with the recently updated Part 75, Appendix D and E provisions.

Further, Associated believes it is necessary that EPA provide a chart or table that will convert compliance in either standard. Compliance obligations should be transparent and consistent. One sample and one analysis per sampling period should be adequate to meet compliance obligations for both rules.

8. Clarify changes are applicable only to "new" sources built after the promulgation date.

It is not quite clear that the direct final rule amendments will be applicable only to "new sources" built after the promulgation date of the direct final rule making. Associated believes this should be evident in the direct final rule and stated, as such. Provisions in existing PSD/NSR permits could be superseded by the direct final rule. Associated opposes any attempt to impose stricter emission limitations or averaging times, as well as record keeping and reporting than that which is contained within our existing permits without a sound scientific basis to do so.

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Conclusion

The proposed rule represents a considerable effort by EPA to clarify and better define the new source performance standard for gas turbines. Associated supports and encourages EPA in its efforts in regards to the proposed rulemaking. Associated has several reservations about some of the proposed rule language, but believe the proposal overall has considerable merit. This approach holds the promise of regaining the workability and usefulness of this standard. The proposed direct final rule attempts to better define regulatory compliance for the modern combustion turbine and utilizes the experience gained from the recent permitting efforts made by many in the utility industry and others knowledgeable of how these regulated sources operate. AECI has identified changes to the direct final rule that make sense in the real world. We urge EPA to adopt Associated's recommendations and complete this rulemaking expeditiously.

Sincerely,

Daniel S. Hedrick

Daniel S. Hedrick
Environmental Specialist II